



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 3, 2020

By ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse, Room 1506
40 Foley Square
New York, New York 10007

Re: *United States v. Mayur Rele*,
19 Cr. 842 (RA)

Dear Judge Abrams:

Pursuant to the Court's Order dated March 25, 2020, the parties have conferred and provide the following status update to the Court.

1. Discovery Status Update.

Since the Government submitted its February 12, 2020 letter to the Court, the Government made two large document productions to defense counsel on February 14, 2020 and March 27, 2020. The March 27, 2020 document production consisted of the entire contents of the defendant's devices seized from the defendant's residence, which amounts to roughly 10 terabytes of data. The discovery materials that remain to be produced are the subset of materials deemed by FBI to be responsive and seized pursuant to both search warrants for the defendant's residence and the Accounting Firm. In the Government's February 12, 2020 letter to the Court, the Government had advised that it expected that the FBI's responsiveness review of these materials would be completed by the end of May 2020. Although FBI is continuing to diligently review these voluminous materials while working from home due to the coronavirus pandemic, some of these materials require review using equipment in FBI's office. Accordingly, the Government now expects that FBI's responsiveness review of these materials will be completed and produced to defense counsel by the end of June 2020.

2. Proposed Pretrial Motions Schedule.

Defense counsel has advised that she does not anticipate beginning her review of the Government's March 27, 2020 document production for a few weeks because she requires the assistance of technology support personnel, who will not be in the Federal Defenders' office due to the coronavirus pandemic, to load it. Given that the March 27, 2020 document production is voluminous, and that the Government will be producing additional documents at the end of June

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2020, defense counsel anticipates needing a few months to review this discovery in order to determine if any pretrial motions will be filed. Accordingly, the parties propose the following schedule for pretrial motions: Defense pretrial motions due on September 14, 2020, Government responses due on October 12, 2020, and Defense reply due on November 2, 2020.

3. Trial Availability.

The parties are available for trial in this case beginning in March 2021. With defense counsel's consent, the Government seeks an exclusion of time from the Speedy Trial Clock between April 3, 2020 and the trial date so that the Government can continue to produce discovery, defense counsel and the defendant can review that discovery to determine if any pretrial motions are to be made, and the parties can litigate any motions, prepare for trial, and engage in discussions about a pretrial disposition.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: Ariel Werner, Esq. (by ECF)

Application granted. The Court adopts the parties' proposed motion schedule. Trial is scheduled for March 1, 2021. A final pretrial conference is scheduled for February 26, 2021 at 3:00 p.m. Pretrial submissions shall be due by February 5, 2021 and any responses shall be due by February 12, 2021. Time is excluded until March 1, 2021, under the Speedy Trial Act, pursuant to 18 U.S.C. 3161(h)(7)(a).

SO ORDERED.



Ronnie Abrams, U.S.D.J.
April 6, 2020